

## FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20461 March 13, 2003

RQ-3

Debbie Hogge-Downing, Treasurer Democratic Party of Oklahoma 4100 N. Lincoln Boulevard Oklahoma City, OK 73105

Identification Number: C00190934

Reference: October Quarterly Report (8/8/02-9/30/02)

Dear Ms. Hogue-Downing:

On February 20, 2003, you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your February 27, 2003 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-From your response, it appears that you are maintaining separate federal and non-federal accounts and allocating your expenses between them. Please note that transfers to reimburse the federal account for the non-federal share of expenses are properly reported on Schedule H3 rather than Schedule A. Please clarify the procedures you are currently using to allocate shared expenses if any, and amend your report to properly reflect this transaction.

You state in your response that the disbursement to Mass for Congress was prize money for a competition. This appears to be a contribution. An expenditure made by any person in cooperation, consultation or concert with, or at the request or suggestion of, a candidate's campaign is considered an in-kind contribution to the candidate. (2 U.S.C. 441a(a)(7)(B)(i)) Please amend your report to properly disclose this disbursement and transfer any reimbursement back to the non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

An adequate response must be received at the Commission by April 2, 2003. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions related to this matter, please contact Brandy Phillips on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson

Assistant Staff Director Reports Analysis Division

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